

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION

IN RE: Ethicon, Inc., Pelvis Repair System  
Products Liability Litigation

MDL NO.: 2327

**APPLICATION OF MARTIN D. CRUMP FOR THE APPOINTMENT TO THE  
PLAINTIFFS' STEERING COMMITTEE**

COMES NOW, Martin D. Crump, current Plaintiffs' Steering Committee member for the Avaulta Pelvic Support Products Liability litigation, respectfully files this application for appointment as a member of the Plaintiffs' Steering Committee and states the following:

**PROFESSIONAL EXPERIENCE**

I am currently a member of the plaintiff's law firm Davis & Crump, PC. The predominant practice area of my firm is representing the rights of individuals who have been injured by dangerous pharmaceuticals and medical devices. Over the past several years, my firm has represented clients in numerous multi-district litigations in our practice areas. Our experience is exemplified by participation in the following litigations: Trayslol, Gadolinium, Hydroxycut, Avandia, Heparin, Sprint Fidelis, Chantix, Zyprexa, Bausch & Lomb, Yaz, Darvocet, Vioxx, and Ortho Evra.

Davis & Crump has filed Pamela Gray-Wheeler v. Johnson & Johnson and Ethicon, Inc., Cause No. 1:12-cv-00003-MPM-DAS, in the Northern District of Mississippi, Northern Division, and is in the process of evaluating and screening over one thousand cases for filing, predominantly in federal courts across the country. Additionally, Davis & Crump has filed multiple cases in the Avaulta Pelvic Support System MDL and anticipates filing additional cases in the future.

Currently, I have practiced law for fifteen (15) years. During this time, I have never been sanctioned by any Court or bar association for any professional or ethical

violations or otherwise. I am licensed to practice law in the states of Missouri, Mississippi, Pennsylvania, Texas and the District of Columbia. Additionally, I am also admitted to practice before the U.S. Court of Veterans' Appeals and the U.S. Court of Appeals for Fifth Circuit. I was also distinguished by the American Trial Lawyers Association as one of the top one hundred (100) trial lawyers in my region for 2009-2012.

I currently serve on the PSC for the Avaulta Pelvic Support Product Liability Litigation. My additional experience in this topic area extends to my involvement in the American Association for Justice (AAJ). With Henry Garrard and Ted Oshman, I co-chair the Transvaginal Mesh Litigation Group. Over the past several months, I have authored and presented transvaginal mesh presentations for two AAJ Rapid Response Teleseminars, presented at a Hot Topics Symposium on transvaginal mesh at the winter convention for AAJ, and delivered a presentation on case selection issues in transvaginal mesh litigation at Mass Torts Made Perfect in Philadelphia, Pennsylvania. I am also currently scheduled to present on the topic of transvaginal mesh at the annual convention for AAJ to be held in Chicago, Illinois.

As to Your Honor's criteria of professional experience of this type, I have served on the Plaintiffs' Executive Committee (PEC) for the Darvocet MDL (In re Darvocet, MDL No. 2226). My MDL plaintiff steering committee services is as follows: Hydroxycut MDL (In re Hydroxycut, MDL No. 2087), Chantix MDL (In re Chantix, MDL No. 2092), and the Avaulta MDL (In re Avaulta, MDL No. 2187). I also co-chair the Discovery Committees for the Darvocet MDL and the Hydroxycut MDL. Finally, I have served on the committees conducting discovery for the Hormone Replacement Therapy MDL, Yaz MDL, Chantix MDL, and Hydroxycut MDL. In addition to my federal MDL service, I have participated in discovery efforts in various state court consolidated

proceedings involving pharmaceutical products such as: Bausch & Lomb, Raptiva, Avandia, Gadolinium and Hydroxycut.

Finally, I fully support the leadership structure recommended by Bryan Alystock, Henry Garrard, and Fred Thompson. Specifically, I have a close working relationship with Henry Garrard, Harry Bell, and Fred Thompson on transvaginal mesh claims as we have worked together for a significant time on the Avaulta Pelvic Support MDL. Additionally, in other litigations, I have worked side by side with Bryan Alystock, Tom Cartmell, Amy Eskin, Amiee Wagstaff, Joe Zonies, Rick Meadow, Michelle Parfitt, Karen Menzies, and Diane Nast (all of whom are proposed lead counsels or PSC members in this matter).

### **CONCLUSION**

I, Martin Crump, and my firm will commit all resources required to expeditiously litigate all facets of this MDL, from start to finish. Our representation of the significant number of clients demands this commitment of money, attorneys, paralegals, and time. I sincerely believe that I, and my firm, have been an asset to the Avaulta PSC, and I respectfully submit that the same would hold true for this MDL.

RESPECTFULLY SUBMITTED this the 26th day of March, 2012.

MARTIN D. CRUMP, APPLICANT

DAVIS & CRUMP, P. C.

BY: /s/ Martin D. Crump  
MARTIN D. CRUMP, ESQUIRE

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